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DR. TATIANA SCHNEIDER and
INTEGRATIVE MEDICAL, P.C.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TATIANA SCHNEIDER, M.D. and
INTEGRATIVE MEDICAL, P.C.,

Plaintiffs,

v.

DEREK O'NEILL, BORN FREE NOW,
LP d/b/a SQ WORLDWIDE and ABC
CORPORATION,

Defendants.

Case No:

CV 17-5416

VERIFIED COMPLAINT

MATSUMOTO, J.

POLLAK, M.J.

Plaintiffs Dr. Tatiana Schneider ("Dr. Schneider") and Integrative Medical, P.C.

("Integrative Medical," collectively, "Plaintiffs") by their attorneys Lewis & Lin LLC, for their
complaint against Defendants Derek O'Neill ("O'Neill"), Born Free Now, LP d/b/a SQ Worldwide
("SQ") and ABC Corporation (collectively "Defendants"), allege as follows:

STATEMENT OF CASE

1. This is an action for recovery of damages and preliminary and permanent
injunctive relief arising from breach of contract, fraud, unjust enrichment and blatant acts of
defamation and unfair competition in connection with, *inter alia*, the publishing of a blog by

Defendants.

2. Defendant O'Neill is a self-described psychotherapist, "wellness expert" and spiritual guru who first swindled Plaintiff Dr. Schneider out of over \$100,000 in cash and jewelry for the ostensible purpose of becoming a practitioner in O'Neill and SQ's "Rising Star" program. However, O'Neill and SQ simply took Dr. Schneider's money and family heirlooms and gave her nothing over a span of 3 years. When Dr. Schneider asked for her money back, O'Neill went vicious and rogue: first, scapegoating Dr. Schneider by falsely accusing her of authoring hundreds of social media posts on the Internet where *third parties* (not Dr. Schneider) spoke out against O'Neill and SQ's fraudulent practices.

3. Then, dissatisfied that his false claims against Dr. Schneider were unsuccessful in removing negative information about O'Neill and SQ authored by third parties off the Internet, O'Neill recently perpetrated another attack campaign against Dr. Schneider and Integrative Medical by publishing and communicating false, defamatory and completely fabricated statements on his blog.

4. O'Neill's personal blog, published to thousands of people online, via email and social media, and accessible across the Internet at www.derekoneill.com, called Dr. Schneider all types of heinous things: a stalker, a criminal, a child predator and having a "mental illness" such that she should not be "practicing medicine."

5. Defendants' blog remains active and, upon information and belief, viewed by thousands of visitors each day, and Defendants continue to defame and injure Plaintiffs with this blog. Beyond O'Neill's false accusations, his warning that, "If I were in New York State, I would be very concerned that she is still practicing medicine," threatens to destroy Plaintiffs' entire business. As a result of Defendants' misconduct, Plaintiffs have been and continue to be

substantially and irreparably harmed.

PARTIES

6. Plaintiff Dr. Tatiana “Tanya” Schneider (“Dr. Schneider”) is a private figure and individual domiciled in Brooklyn, New York.

7. Plaintiff Integrative Medical, P.C. d/b/a Transformational Psychiatry (“Integrative Medical,” collectively with Dr. Schneider, “Plaintiffs”) is a professional corporation organized and existing under the laws of the State of New York.

8. Upon information and belief, Defendant Derek O’Neill is an individual who is domiciled in Ireland, a partner in SQ, and who owns, directs and/or controls SQ, and who has directed the wrongful conduct complained of herein.

9. Upon information and belief, Defendant Born Free Now, LP d/b/a SQ Worldwide (“SQ”) is a limited partnership organized and existed under the laws of the State of Delaware, and registered as a foreign partnership in the State of New York, qualified in Kings County, with a principal place of business at 866 Union Street, Apt. 4B, Brooklyn, NY 11215.

10. The true name and capacity of the Defendant sued herein as ABC Corporation is unknown to Plaintiffs, which sue said Defendant by such fictitious name. Upon information and belief, ABC Corporation is an affiliate, subsidiary, partner and/or alter ego of O’Neill and/or SQ, which has received funds from and/or participated in the wrongful conduct complained of here. ABC Corporation is engaged in commerce in the United States, including within this judicial district. If necessary and after discovery, Plaintiffs will seek leave of court to amend this Complaint to state ABC Corporation’s true name and capacity when ascertained.

JURISDICTION AND VENUE

11. This Court has jurisdiction over the subject matter of this action pursuant to the Lanham Act, 15 U.S.C. § 1051 et seq. This Court has also subject matter jurisdiction, *inter alia*, pursuant to 28 U.S.C. §§ 1331, 1332, 1338, and 1367.

12. This Court has pendent jurisdiction of the related state law claims asserted in this action pursuant to 28 U.S.C. § 1367 because they involve the same parties, they arise from the same operative facts common to the causes of action arising under the federal claims, and because the exercise of pendent jurisdiction serves the interests of judicial economy, convenience and fairness to the parties.

13. This Court has personal jurisdiction over Defendant SQ because its principal place of business is in the State of New York and within this judicial district.

14. This Court has personal jurisdiction over Defendant O'Neill because he is a partner of SQ and, upon information and belief, derives substantial revenue from services rendered in the State of New York and maintains a principal place of employment in the State of New York and within this judicial district.

15. This Court also has personal jurisdiction over Defendants pursuant to CPLR §§ 302(a)(1), (2) and (3) because (as further described below) they (i) transact business within the State of New York and contracted to supply services in the State of New York, (ii) committed a tortious act within the State of New York and (iii) caused tortious injury to a person within the State of New York, while regularly doing and soliciting business and deriving substantial revenue from services rendered in the State of New York. As a threshold matter, the operative contract was made out to a New York resident, was delivered to the State of New York, and included performance and payment obligations to be made in the State of New York.

16. Defendants further subjected themselves to this Court's jurisdiction by invoking the benefits and protections of this State in an attempt to cause harm within the State of New York. Defendants orchestrated false and defamatory posts, made between July 19, 2017 and the present, which mentioned Plaintiffs' residence and business practice in New York, while Defendants engage in substantial competition with Plaintiffs.

17. Venue is proper in this judicial district under 28 U.S.C. § 1391(b) and (c), since some, or all, of the conduct that is the subject of this action occurred in this district.

BACKGROUND COMMON TO ALL CLAIMS

18. Dr. "Tanya" Schneider, M.D., PhD, is a clinical psychiatrist and physician currently managing a private medical practice in Manhattan. She is board-certified in adult, child and adolescent psychiatry and has an integrative approach to medicine and psychiatry, having her emphasis on body, mind and spirit. Dr. Schneider also received her PhD in scientific biological research.

19. Prior to opening a private practice, Dr. Schneider worked as an assistant professor on the faculty of Mt. Sinai Hospital, providing diagnostic assessments, pharmacological and psycho-therapy treatment to the child population; as giving courses on assessment and on psychotherapy with children to medical students and fellows; and acting as one of the supervisors of the out-patient clinic.

20. Under her business, Integrative Medical d/b/a Transformational Psychiatry, P.C., Dr. Schneider specializes in combining modern pharmacological therapy and different psycho-therapeutic modalities, e.g. "integrative medicine."

Defendants' Wrongful Conduct and Theft of Thousands of Dollars

21. While developing her practice in 2005, Dr. Schneider was introduced to

Defendant Derek O'Neill, a self-described psychotherapist, "wellness expert," "transformational therapist," motivational speaker and spiritual guru based in Ireland, at a workshop in New York.

22. Defendant O'Neill runs and operates Defendant SQ a/k/a SQ Wellness, a competing psychotherapy business operating out of New York City. Defendant O'Neill also runs and operates a foundation named "SQ Foundation" based out of New York, that solicits funds for Defendant O'Neill's activities in India—where he travels to frequently.

23. Defendant O'Neill has allegedly built a worldwide following of world leaders, businesses, celebrities and athletes through speaking engagements, books, DVDs and workshops promoting his personal growth and quasi-medical, healing techniques entitled "the Spiritual Quotient" or "SQ." According to Defendants, Spiritual Quotient "represents pure energy of the highest vibration and frequency, the guiding tools for all that is created."

24. Defendants' Spiritual Quotient "energy programs" include workshops entitled, *inter alia*, the "Rising Star" energy treatment—that purportedly assist "humanity in moving forward toward health, happiness and enlightenment."

25. Defendants hold paid seminars and workshops around the globe in support of their programming. In addition, Defendants run a full-service "wellness center" in Dublin, Ireland (named "Creacon") which provides lodging to attendees at Defendants' workshops and annual seminars scheduled there. Before, during and at those workshops, Defendants would solicit cash, jewelry, real and personal property and professional services from attendees and potential attendees.

26. In addition to hosting attendees in at the Wellness Center, Defendant O'Neill would routinely take members to his home in Ireland for training and initiation.

27. Defendants also offer, for an additional fee, training and certification for

applicants interested in becoming a Rising Star Practitioner. *See*

<https://www.derekoneill.com/become-a-practitioner/>. Defendants claim that their certification classes “offer a warm and inviting experience” that incorporate “training, manuals, and hands-on practice.”

28. Defendants further claim that as a certified practitioner, “you will be granted access to an online resource,” where they publish business and marketing tools to assist in applicants’ wellness practice. In addition to the items mentioned above, Defendants promise one-on-one sessions with Defendant O’Neill to complete the Rising Star certification.

29. It was this renown and following that interested Dr. Schneider in Defendant O’Neill’s platform, workshops and teachings, and specifically, the “Rising Star” certification to incorporate into her own integrative medicine practice. Unbeknownst to Plaintiffs, Defendants were fraudsters too.

30. Before Plaintiffs discovered that Defendants were the driving forces behind the authoring of lies and reputational/character assaults described below, beginning in 2005 until late 2014, Dr. Schneider and her family would visit Defendants’ Wellness Center in Ireland twice a year to attend Defendants’ workshops. The cost to attend these was approximately \$4,000 per person.

31. During her many visits to Ireland and subsequent meetings at workshops in New York, Dr. Schneider and Defendant O’Neill developed a trust and professional bond. In or around 2012 to 2013, Defendant O’Neill even offered to and did supervise Dr. Schneider on her upcoming book on astrology.

32. In or around June 2013, seeking to become a Rising Star practitioner, Dr. Schneider enrolled in the Rising Star Practitioner Training program with Defendants.

33. In order to become Rising Star practitioner, an applicant must pay a fee (as set by Defendants), and attend certification classes and sessions with Defendant O'Neill.

34. Defendants, by communications from Defendant O'Neill, represented to Dr. Schneider that she would receive one-on-one sessions with Defendant O'Neill.

35. Thus, as a part of the certification process, Dr. Schneider was to remit payment to Defendant. Dr. Schneider transferred \$100,000 in cash to Defendants over a period of 13 months from June 2013 until September 2014.

36. Specifically, Dr. Schneider transferred the following amounts in 2013:

- a. On July 2, 2013, \$30,000 to Defendants' Bank of Ireland business account; and
- b. On July 23, 2013, \$50,000 to Defendants' Bank of Ireland business account.

37. For reasons unknown to Plaintiffs, the \$50,000 transfer on July 23, 2013 was reversed the following day and returned to Plaintiff Dr. Schneider.

38. As soon as Dr. Schneider transferred \$80,000 (\$30,000 of which Defendants retained), Defendants began making excuses for why Dr. Schneider could not begin her certification courses and sessions.

39. Defendants strung Dr. Schneider along for years, as their excuses kept changing and their monetary demands kept increasing.

40. For example, in October 2013, as Defendant O'Neill was promoting a new book in New York, Dr. Schneider met with him inquiring as to when her Rising Star certification classes would begin and Defendant O'Neill then asked Dr. Schneider to come to Ireland "anytime in November."

41. As such, Dr. Schneider traveled to Ireland in November 2013.

42. Upon arrival, Dr. Schneider was turned away and not allowed to enter the

Wellness Center—even though she had already paid for several nights lodging there—because apparently, Defendant O’Neill was upset that she had visited when he was not there.

43. Then, in January 2014, Dr. Schneider inquired with Defendant O’Neill again so she could begin her Rising Star certification classes that she had already paid thousands for. In response, Defendant O’Neill told Dr. Schneider she had to pay more money for the Rising Star classes.

44. As such, on March 27, 2014, Dr. Schneider transferred an additional \$10,000 to Defendants’ Bank of Ireland business account.

45. Then, on September 22, 2014, Dr. Schneider transferred another \$10,000 to Defendants’ Bank of Ireland business account—for a total of \$50,000.

46. Believing Defendants’ representations that she would soon receive Rising Star certification classes, Dr. Schneider ingratiated herself within the SQ community and gave free psychiatry sessions to members of the community, at Defendant O’Neill’s request.

47. In connection with these promises, Plaintiffs also began referring her patients and clients to Defendant O’Neill’s workshops, as well as Defendants’ blog—then accessible at <sq-wellness.com>, now available at <derekoneill.com>.

48. Despite the fact that Dr. Schneider paid over \$50,000 in cash to Defendants by the Fall 2014, Defendants still had not fulfilled any promises to provide Rising Star certification classes or one-on-one sessions with Defendant O’Neill.

49. Defendants effectively made Dr. Schneider dependent upon them, as her patients and clients were led to believe that she was associated with Defendants’ “Rising Star” program, because Dr. Schneider had not only paid to receive such certification, but was repeatedly promised by Defendants (between 2013 and 2014) that her formal certification and practitioner

instruction would commence immediately.

50. Unfortunately, no such instruction was ever provided as promised by Defendants.

51. In late 2014, Dr. Schneider confronted Defendant O'Neill about Defendants' failure to provide Rising Star certification classes. In response, Defendant O'Neill assured Dr. Schneider that she would receive the classes she paid for, and told Dr. Schneider that he needed for more things of value from her to complete the certification.

52. Specifically, Defendant O'Neill stated that Dr. Schneider needed to give him "all her jewelry" if she wanted "rid herself of negative energy" to proceed with the program. As such, Dr. Schneider gave Defendant O'Neill over \$10,000 worth of antique and precious jewelry, including many family heirlooms.

53. Upon information and belief, Defendant O'Neill took Dr. Schneider's jewelry and re-gifted as wedding gifts to his friends and associates in India.

54. Again, notwithstanding the \$50,000 in cash and \$10,000 in jewelry, by August 2015 (over a year later), Defendants still had not fulfilled their promises to provide Rising Star certification classes or one-on-one sessions with Defendant O'Neill.

55. As such, in or around August 2015, Dr. Schneider asked for her money back.

56. In or around August 2015, Defendant O'Neill falsely claimed to Dr. Schneider that he had never taken her jewelry and utterly refused to refund any of her money—despite Defendants' not providing any services as promised.

57. Instead, Defendant O'Neill claimed he sent energy to Dr. Schneider "remotely."

58. Dr. Schneider refused Defendant O'Neill's "remote" energy, and again demanded return of her money and, presuming her irreplaceable jewelry to be gone forever, the value of her jewelry.

59. When Defendants refused to return anything to Dr. Schneider, she admittedly posted critical, truthful reviews about Defendants on her Facebook account.

60. Nearly immediately thereafter, various third parties popped up in response to Dr. Schneider's posts, echoing her sentiments and reciting their own accounts of misrepresentations and fraud with Defendants. Hundreds of social media posts appeared on the Internet where third parties spoke out against O'Neill and SQ's fraudulent practices.

61. Despite their similarities to Dr. Schneider's experience, she did not author any of those posts.

62. After years of demands and no return of her funds, in mid 2016, Dr. Schneider reported Defendants to the Federal Bureau of Investigations.

63. Upon information and belief, Defendants were notified of the FBI report and commenced a smear campaign against Dr. Schneider in retaliation.

Defendants' False and Defamatory Statements in Retaliation Against Plaintiffs

64. Specifically, on or about August 2016, upon information and belief, Defendants contacted the offices of the District Attorney in New York City purporting to report various cyber violations alleged to have been perpetrated by Dr. Schneider (the "August 2016 Report").

65. Upon information and belief, in the August 2016 Report, Defendant O'Neill falsely scapegoated Dr. Schneider by accusing her of authoring all of the hundreds of social media posts on the Internet where third parties spoke out against O'Neill and SQ's fraudulent practices.

66. Dr. Schneider authored no such posts.

67. In addition, in the August 2016 Report, Defendant O'Neill falsely accused Dr. Schneider of sending threatening emails to him while he was in New York in 2016.

68. Dr. Schneider sent no such emails.

69. Upon information and belief, Defendant O'Neill made the August 2016 Report not only as a continuation of his scheme, but also in retaliation for various critical comments made by Dr. Schneider with respect to Defendants' outright theft of thousands of dollars described above. Upon further information and belief, Defendant O'Neill made the false August 2016 Report to obfuscate the truth about his fraudulent business practices.

70. Based on Defendant O'Neill's false August 2016 Report, the District Attorney's Office filed a complaint against Dr. Schneider in December 2016.

71. Although she vehemently denied the allegations in the complaint, Dr. Schneider again attempted to reconcile with Defendant O'Neill to persuade him to recant his false August 2016 Report that begat the District Attorney's complaint.

72. Upon information and belief, Defendant O'Neill desired to use Dr. Schneider as a pawn—not only to silence her—but also to silence other critics of Defendants on the Internet.

73. As such, in mid to late February 2017, Defendant O'Neill offered to withdraw his false claims made to the District Attorney's Office if Dr. Schneider would sign a letter drafted by O'Neill where she accepted responsibility for things she did not do—i.e., authoring the various, third party social media posts that accused Defendants of wrongful conduct.

74. Wishing to avoid the embarrassment and uncertainty of the District Attorney's complaint, Dr. Schneider agreed to Defendant O'Neill's strange demand in exchange for his promise to withdraw his false claims made to the District Attorney and not publish the letter publically.

75. What Plaintiffs did not realize was this was another one of Defendant O'Neill's schemes to continue to string Dr. Schneider along without admitting to his fraud, as he never

intended to and did not withdraw those false claims against Dr. Schneider. Once Dr. Schneider realized Defendant O'Neill's plan, it was too late, as O'Neill already had a copy of the coerced letter.

76. Upon information and belief, in or around June 2017, Defendant O'Neill presented the coerced letter to moderators of the social media platforms in an effort to remove the various, third party social media posts that accused Defendants of wrongful conduct.

77. Upon information and belief, and according to Defendant O'Neill retaliatory and defamatory post below, the moderators refused O'Neill's takedown requests.

78. Dismayed that his plan was stymied by the truth—i.e. that Dr. Schneider had nothing to do with the various, third party social media posts that accused Defendants of wrongful conduct—Defendant O'Neill escalated his vicious behavior and attack against Dr. Schneider.

79. Specifically, on or around July 19, 2017, Defendant O'Neill authored a harassing and defamatory post entitled "Dark Attacks: Life with a Stalker" (accessible to the public on the Internet via <<https://www.derekoneill.com/dark-attacks-life-with-a-stalker/>>) (the "Defamatory Blog"), accusing Plaintiff Dr. Schneider of having a "mental illness," being "mentally ill," being a "stalker," and "vandalizing" O'Neill's home. The Defamatory Blog also insinuates that Dr. Schneider was a perpetrator of inappropriate physical contact with O'Neill's grandchildren—whom Dr. Schneider has never seen, much less met or been in contact with.

80. The above statements are knowingly and materially false, and were made to defame Plaintiffs.

81. A true and correct copy of the Defamatory Blog is annexed hereto as **Exhibit A**.

82. The Defamatory Blog also repeats Defendant O'Neill's false claims that Dr.

Schneider orchestrated some anonymous attack campaign against Defendants, stating she “has posted the same false, defamatory accusations in online forums, using various aliases in an attempt to make it look like multiple people were making the same claims.” This is patently untrue.

83. Within the same Defamatory Blog, Defendants likewise made unseemly comparisons between Plaintiff Dr. Schneider and “cyber bullying” and “abuse” against children, i.e. serious crimes, in an effort to promote his book on bullying. Thus, by linking Dr. Schneider to these forms of child abuse, Defendant O’Neill intentionally attempts to bring Plaintiffs’ reputation, credibility and good will in ill repute.

84. Beyond O’Neill’s false accusations, his warning in the Defamatory Blog that, “If I were in New York State, I would be very concerned that she is still practicing medicine,” threatens to destroy Plaintiffs’ entire business.

85. In his Defamatory Blog, Defendant O’Neill further claims (i) that the blog is a “personal account by Derek O’Neill;” (ii) that he has “spent countless hours speaking with” and over “eight years” of interactions with Dr. Schneider; (iii) that he has published a book on the type of activity he falsely accuses Dr. Schneider of—all to give the impression that his statements about Dr. Schneider are grounded in fact, not opinion.

86. Defendants authored the entries in such a fashion that no reasonable person would believe that the statements made therein were opinion, but rather statements of fact about Plaintiffs Dr. Schneider and Integrative Medical.

87. Furthermore, because of Defendant O’Neill’s stature in the community as a respected psychotherapist (including his claims of running “extremely successful private practice for more than 15 years as a therapist”), readers understood the above statements to be factual.

88. Upon further information and belief, from July 19, 2017 to the present, Defendant has communicated these same false and defamatory statements to other individuals, via email, social media, orally and elsewhere in writing.

89. The Defamatory Blog has remained active and accessible through the Internet since its creation.

90. The ostensible purpose of the Defamatory Blog is to provide a recounting of Defendant O'Neill's "personal account" of years of experience with Dr. Schneider.

91. In fact, the Defamatory Blog is used by Defendants to publish falsehoods about Plaintiffs and publically flog Dr. Schneider for negative posts *made by third parties* and that she had *nothing to do with*, all in an effort to undermine Plaintiffs' demands for the \$60,000 Defendants fraudulently stole and after Defendant O'Neill got upset when Dr. Schneider reported him to the authorities.

92. Upon information and belief, hundreds, if not thousands, of people each day view the Defamatory Blog, which, upon further information and belief, has a significant influence on viewers' perception of Plaintiffs.

93. Many of Defendant O'Neill's statements are false and completely fabricated. They have been published for the overt purpose of destroying the reputations and business of Dr. Schneider and Integrative Medical.

94. The Defamatory Blog has had its intended effect: on information and belief, thousands of viewers of the blog have been misled about Dr. Schneider and Integrative Medical.

95. Plaintiffs have received numerous inquiries about the truthfulness of the statements on the Defamatory Blog. Many of these inquirers have expressed anger, frustration, confusion or dismay to Plaintiffs based on the Defamatory Blog.

96. In fact, many of Dr. Schneider's patients were on Defendants' mailing list and received copies of the Defamatory Blog.

97. Three of Dr. Schneider's patients have either stopped or refused to continue seeing Dr. Schneider at Integrative Medical due to the false statements made in the Defamatory Blog.

98. Upon information and belief, Defendants published the Defamatory Blog for the sole purpose of harming Plaintiffs' reputation and causing them to lose revenue as the statements in the Defamatory Blog bear directly on Plaintiffs' services, professional capabilities, business practices, and treatment of their clients—all key aspects of Plaintiffs' business and factors that any patient considers before choosing to see a doctor.

99. The statement that Dr. Schneider is "mentally ill" and has a "mental illness" is and has been devastating to her practice as clinical psychiatrist. No one wants to see a psychiatrist (or any doctor) who has a mental illness.

100. Defendants posted the Defamatory Blog on their high-profile blog precisely because they know that patients seeking integrative medicine practitioners like Plaintiffs and Plaintiffs' own patients review their website regularly.

101. Indeed, Plaintiffs and Defendants both compete in the health care and psychotherapy markets, including the areas of therapeutic services and integrative medicine.

102. Thus, upon information and belief, Defendants knew that the Defamatory Blog would stifle competition with Plaintiffs, especially considering Defendants are non-MD providers, and psychotherapy patients prefer to seek services with licensed MDs like Dr. Schneider.

103. Plaintiffs had and continues to have contractual relationships with their patients,

customers and vendors.

104. Defendants scripted and caused to be disseminated the above statements as part of an intentional, malicious and systematic campaign to interfere with Plaintiffs' contractual relationships with its patients, customers and vendors, and upon information and belief, to wreak havoc on Plaintiffs' business by inducing Plaintiffs' patients, customers and vendors and prospective patients to cease doing business with Plaintiffs.

105. As a direct and proximate result of Defendant's defamatory conduct described herein, a number of Plaintiffs' patients have been confused, refused to start and/or continue business with or visiting Plaintiffs.

**FIRST CLAIM FOR RELIEF
VIOLATION OF THE LANHAM ACT
UNDER 15 U.S.C. § 1125(a)(1)(B)**

106. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

107. Defendants' publication of false and misleading statements about Plaintiffs and Plaintiffs' services constitutes false advertising in violation of 15 U.S.C. § 1125(a)(1)(B).

108. Defendants' publication of false and misleading statements about Plaintiff and Plaintiffs' services is likely to deceive consumers as to the nature and quality of Plaintiffs and Plaintiffs' services.

109. As a direct and proximate result of Defendants' unlawful acts, Plaintiffs have suffered irreparable damage to their reputations and will continue to suffer significant and irreparable reputational injury, in addition to significant monetary damages in amounts to be determined at trial.

**SECOND CLAIM FOR RELIEF
TRADE LIBEL AND COMMERCIAL DISPARAGEMENT**

110. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as

though fully set forth here.

111. Defendants have intentionally made knowingly false statements of fact about Plaintiffs on the Defamatory Blog.

112. These statements were made maliciously and willfully, and were intended to cause harm to Plaintiffs' business integrity and reputation.

113. The aforementioned statements were false when made and Defendants knew or should have known that the statements were false when made.

114. The statements were made with reckless disregard for their truth or falsity or with knowledge of their falsity and with wanton and willful disregard of the reputation and rights of Plaintiffs.

115. The aforementioned statements were made of and concerning Plaintiffs, and were so understood by those who read Defendants' publication of them.

116. Among other statements, O'Neill's personal blog, published to thousands of people online, via email and social media, and accessible across the Internet at www.derekoneill.com, called Dr. Schneider all types of heinous things: a stalker, a criminal, a child predator and having a "mental illness" such that she should not be "practicing medicine."

117. These statements were false, and were published to third parties in this district and across the Internet.

118. Defendants have no privilege to assert their false and disparaging statements.

119. As a result of Defendants' acts, Plaintiff s has suffered irreparable damage to their reputations and further damages in an amount to be determined at trial.

120. As a result of the willful and malicious nature of the defamation, Plaintiffs are entitled to punitive damages.

THIRD CLAIM FOR RELIEF
UNFAIR COMPETITION

121. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

122. Defendants authored and are using the Defamatory Blog to divert users searching for Plaintiff Dr. Schneider to Defendants' competing business.

123. Defendants posted false and defamatory complaints about Plaintiff online.

124. Upon information and belief, Defendants knew that Google displays search results to users searching for the people and companies named in those titles and addresses, which results are highly ranked, and that such a false complaint would harm Plaintiffs' reputations and business in this district and elsewhere.

125. Upon information and belief, by posting the complaint online with the statement "Tatiana (Tanya) Schneider, MD, a practicing psychiatrist in New York," therein, Defendants intended to use their defamatory statements as a means to generate business by turning customers away from Plaintiffs, and redirecting them to Defendants.

126. Upon further information and belief, Defendants intended to use their threats of the destruction of Plaintiffs' business to obfuscate Defendants' own fraud, deceit and \$60,000 debt to Dr. Schneider.

127. These acts and others stated above constitute a pattern of common law unfair competition, entitling Plaintiffs to recovery of compensatory and punitive damages, in an amount to be proved at trial, including compensation for Plaintiffs' time, effort and attorney's fees.

FOURTH CLAIM FOR RELIEF
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

128. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

129. Defendants statements that Dr. Schneider is, *inter alia*, a stalker, child abuser and “mentally ill” occurred intentionally with a desire to harm Dr. Schneider.

130. The manner by which Defendants sought to harm Dr. Schneider, including the steps described herein via creation of the Defamatory Blog to communicate with the public at large, was extreme and outrageous.

131. As a result of Defendants’ past and continued wrongful acts, including, *inter alia*, besmirching Dr. Schneider’s reputation, Dr. Schneider has experienced extreme emotional distress.

132. As a result of Defendants’ past and continued wrongful acts, the character and reputation of Dr. Schneider were harmed and she suffered mental anguish and personal humiliation.

133. As a direct and proximate result of Defendants’ past and continued wrongful acts, Dr. Schneider has been materially and substantially damaged in an amount to be proved at trial, including compensation for Dr. Schneider’s time, effort and attorney’s fees.

FIFTH CLAIM FOR RELIEF
TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS AND
PROSPECTIVE CONTRACTUAL RELATIONS

134. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

135. Plaintiffs had existing contracts with its customers and reasonably expected that its contractual relationships with its patients and customers would continue into the future.

136. Defendants knew of Plaintiffs' contracts. Indeed, Defendants were aware that Dr. Schneider is a practicing psychiatrist because she was referred patients by Defendants in the past.

137. By the wrongful conduct described above, Defendants internationally and improperly interfered with Plaintiffs' contracts with its patients and customers and did so with the intent and purpose of damaging Plaintiffs' business.

138. Defendants' interference caused Plaintiffs' customers confusion and to cease doing business with Plaintiff.

139. At least three of Plaintiff's patients who received the Defamatory Blog have decided to cease seeing Dr. Schneider.

140. Potentially hundreds more prospective patients will never inquire with her due to the Defamatory Blog—which was Defendants' precise intention— warning that, "If I were in New York State, I would be very concerned that she is still practicing medicine."

141. As a result of Defendants' actions, Plaintiff has been and continues to be damaged in an amount to be determined at trial.

142. Plaintiffs have also suffered and will continue to suffer irreparable harm in the form of damage to its reputation as a result of Defendants' conduct described herein.

143. While an award of damages may be adequate to compensate Plaintiffs for the loss of particular patients, contracts or customers, an award of damages will not be adequate to compensate Plaintiffs for the damage to their reputation caused by Defendants. Plaintiffs have suffered and will continue to suffer irreparable harm unless injunctive relief is granted.

SIXTH CLAIM FOR RELIEF
BREACH OF CONTRACT

144. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

145. At all times relevant hereto, a valid, binding and enforceable contract existed between Plaintiff Dr. Schneider and Defendants.

146. Defendants contracted with Plaintiff Dr. Schneider

147. At all times material to the instant proceeding, Plaintiff fully performed its obligations under the contract.

148. Pursuant to the terms of the contract, Plaintiff paid Defendants \$60,000 in cash and jewelry in exchange for, *inter alia*, services and certification classes.

149. Defendants have materially breached the parties' agreement by not upholding their obligations to provide the services and certification classes to Plaintiff Dr. Schneider.

150. As a result of Defendants' breach, Plaintiff Dr. Schneider is entitled to rescission of the contract and judgment against the Defendants jointly and severally in the amount of sixty thousand dollars (\$60,000.00), plus interest, costs and plaintiff's attorneys' fees.

**SEVENTH CLAIM FOR RELIEF
UNJUST ENRICHMENT**

151. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

152. Defendants benefited from the monies advanced to them by Plaintiff Dr. Schneider, for which Defendants did not adequately repay Plaintiff or provide value.

153. Under principles of equity and good conscience, Plaintiff Dr. Schneider is entitled to full restitution of \$60,000.00, plus interest, constituting the value of the monies that Defendants unjustly derived from Plaintiff.

EIGHTH CLAIM FOR RELIEF
FRAUD

154. Plaintiffs reallege and incorporate by reference Paragraphs 1 through 105 as though fully set forth here.

155. Plaintiff Dr. Schneider was induced to enter into and enroll in the Rising Star certification course by Defendants' representations above, including but not limited to Defendants' representations that she would receive one-on-one sessions with Defendant O'Neill.

156. In truth, Defendants had no intention of providing one-on-one sessions.

157. Defendants knew or reasonably should have known that the foregoing representations were false when made.

158. Upon information and belief, Defendants made the above representations with the intent to deceive Plaintiffs into entering into and enrolling in the Rising Star certification course, whereby Defendants would incur substantial pecuniary benefit at the expense of Plaintiff.

159. Plaintiff Dr. Schneider reasonably relied on Defendants' representations, and Defendants purported years of experience and industry expertise—indeed, the Rising Star certification course is exclusive to Defendants.

160. Plaintiff Dr. Schneider paid Defendants for what was valued as and what Plaintiff Dr. Schneider believed to be one-on-one sessions with Defendant O'Neill.

161. Plaintiff received neither courses nor sessions. Therefore, Plaintiff received nothing of value in the amount that Plaintiff remitted to Defendants.

162. As a direct and proximate result of Defendants' fraud, Plaintiff Dr. Schneider has been damaged in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants awarding Plaintiffs:

1. Enter a judgment declaring that Defendants' conduct violates 15 U.S.C. §1125(a);
2. Enter a judgment declaring that Defendants' conduct constitutes trade libel and/or commercial disparagement under the laws of the State of New York;
3. Enter a judgment declaring that Defendants' conduct constitutes unfair competition under the laws of the State of New York;
4. Enter a judgment declaring that Defendants' conduct constitutes tortious interference;
5. Enter a judgment declaring that Defendants' conduct constitutes fraud;
6. Enter a judgment in the amount of \$60,000 with interest thereon from September 22, 2014;
7. Award Plaintiffs compensatory damages according to proof at trial but in an amount not less than \$1,000,000.00;
8. Award Plaintiffs punitive damages pursuant to the Lanham Act and the common law, due to Defendants' willful and wanton behavior;
9. Enter a temporary and permanent order, enjoining Defendants from publishing the false advertising statements identified above in relation to Plaintiffs and directing Defendant and its respective agents, servants, employees, successors and assigns, and all other persons acting in concert with or in conspiracy with or affiliated with Defendant, to remove, delete, or otherwise disable such posts;
10. Enter a temporary and permanent order, enjoining Defendants from publishing the statements constituting trade libel and/or commercial disparagement identified above in relation to Plaintiffs and directing Defendants and its respective agents, servants, employees, successors and assigns, and all other persons acting in concert with or in conspiracy with or affiliated with Defendants, to remove, delete, or otherwise disable such posts;

11. Award Plaintiffs reasonable attorney's fees, costs and disbursements in this civil action; and
12. Enter such other and further relief to which Plaintiffs may be entitled as a matter of law or equity, or which the Court determines to be just and proper.

Dated: Brooklyn, New York
September 14, 2017

LEWIS & LIN, LLC

By: /s/ Justin Mercer

David D. Lin, Esq. (DL-3666)

Justin Mercer, Esq. (JM-4514)

45 Main Street, Suite 608

Brooklyn, NY 11201

Tel: (718) 243-9323

Fax: (718) 243-9326

Email: david@iLawco.com

justin@iLawco.com

Counsel for Plaintiffs

VERIFICATION

STATE OF NEW YORK)
 ss:
COUNTY OF NEW YORK)

I, DR. TATIANA SCHNEIDER, declare under penalty of perjury that:

1. I am an officer of Plaintiff Integrative Medical, P.C.
2. I have read the foregoing complaint and state that the matters alleged therein are true based upon my knowledge, or the relevant business records of Integrative Medical, P.C., except as to matters alleged on information and belief, and as to those matter I believe to be true.



DR. TATIANA SCHNEIDER

Exhibit A

Blog

"IF YOU DON'T CHANGE YOUR MIND, YOU CANNOT CHANGE YOUR WORLD"

Dark Attacks: Life with a Stalker

Posted 19th July 2017



A personal account by Derek O'Neill

DEALING WITH A STALKER

It may come as a shock to many who read these words to learn that for years, I have been the target of vicious attacks on my character and reputation. I have chosen not to share this information publicly in order to protect the person perpetuating these actions, who is mentally ill. She is someone who has attended my workshops and trainings, and when her inappropriate actions toward me began years ago, I attempted to assist her in getting the help she needed rather than pursue legal avenues. I have spent countless hours speaking both with this woman and with her family members to offer support and guidance about how to connect her with the kinds of professionals who could help treat her mental illness. Sadly, after years of being patient and great effort spent with the loving intention to help this woman help herself, she has refused to accept many of the resources offered to her and continued her abusive behavior toward me. I must now choose a different path, and I am sharing the details of her actions so that I can also share the steps I have taken in service to the five human values of Love, Truth, Peace, Non-Violence and Right Conduct.

For the past eight years, Tatiana (Tanya) Schneider, MD, a practicing psychiatrist in New York, has executed a full-scale attack on my reputation and character. She has stalked me at my home, at business events and online. She has written hundreds, if not thousands, of emails and social media posts about me, making horrific allegations of rape, abuse, theft and even murder. She has routinely contacted those who follow me on social media – such as colleagues, business partners, media outlets and others who have attended my public events – and barraged them with false allegations of heinous things I had supposedly done. On several occasions, Tanya has come to my home in Ireland, where my two young grandchildren often play in the yard; on one of these occasions, security footage caught her vandalizing my home. On another, a neighbor prevented her from grabbing my granddaughter, Alexa, who was playing out front. There is an open warrant for her arrest in that country, should she ever set foot in it again.

LEGAL ACTION AND THE PROOF OF INNOCENCE

The abuse did not stop with direct contact or social media assaults. Tanya has posted the same false, defamatory accusations in online forums, using various aliases in an attempt to make it look like multiple people were making the same claims.

In early 2017, the New York District Attorney's office decided to press charges against Tanya based on her stalking and malicious behavior toward me. She pled guilty to disorderly conduct, admitting in a signed legal document that all of the allegations she had made were completely false, and that her actions were attempts to get attention.

On February 28, 2017, the State of New York issued an Order of Protection against Tanya for two years, forbidding her to make contact with me or others associated with me. She was also ordered to begin treatment with a licensed psychotherapist. The order states that failure to obey the terms may subject her to prosecution and potential incarceration for up to seven years.

Unfortunately, even after seeing legal documents of Tanya's guilty plea to disorderly conduct, brought against her by the State of New York, and the resulting Order of Protection – the moderators of the forums, where Tanya has posted about me, declined to remove the posts, saying that they needed evidence that the aliases used were created by Tanya. While I understand the moderators' desire to be thorough on this point, it has been very frustrating to bear the burden of proof of my innocence, when the evidence for it is so clear.

Even with such severe legal penalties looming for breaking the Order of Protection that was put in place earlier this year, Tanya has continued to contact me, my friends, and my business associates – by phone, by email, and on social media. These actions are a clear violation of the Order. Unwilling to leave myself, my family, or my friends and colleagues at risk for further harassment or potential danger, I was left no choice but to report the violations of her Order to the authorities. If I were in New York State, I would be very concerned that she is still practicing medicine.

PUTTING AN END TO BULLYING BEHAVIOR

A few years ago, I published a book on [Bullying \(https://store.derekoneill.com/collections/frontpage/products/bullying\)](https://store.derekoneill.com/collections/frontpage/products/bullying), in which I dedicated a chapter to the modern issue of cyber bullying. My heart goes out to the children who are most impacted by this hurtful form of abuse. Many go on to commit suicide or experience low self-esteem and depression.

While technology experts are working on ways to help, with things like filters to detect bullying language on Facebook and other outlets, I believe that we need to modernize legal systems, not only to capture language and activity indicative of potential personal harm but also to ensure that those who have been convicted of crimes adhere to appropriate technology practices. Violations should also be detectable across state borders.

Dark Attacks: Life with a Stalker | Derek O'Neill

It is my sincerest wish that those struggling with mental illness find help. A bully is usually someone who is suffering in some way, whether from past hurts or an inability to believe in themselves without putting someone else down. A bully doesn't feel complete on their own terms. When we work to stop bullying, using all the resources at our disposal, it can have a positive effect and help stop the chain of abuse.

THE PATH OF SERVICE

I have spent my whole life helping people. If you look at my website (derekoneill.com) and my charity's website (sq-foundation.org), you will see my service in action. I have very carefully considered the legal action I am now taking with Tanya to ensure that it is indeed of service to her and to all concerned. I do not take this action lightly.

Despite all that she has done and the damage she has attempted to cause to my reputation, loved ones and livelihood, I do not hold ill will toward Tanya. As I write these words, I still hold compassion for her. My hope is that the criminal charges she will now face will open another opportunity for Tanya to get help and prevent her from doing anything that will have a devastating effect on her and her family.

I know that there are others out there who may not like me; some may even hate me. If so, they are only projecting their own shadow. With every person who has ever crossed my path, I have only tried to help as I best I could with the tools I had.

May all beings in the world learn to love themselves and others. Only then will we realize that what we do unto others, we do unto ourselves and what we do unto ourselves, we do unto others. We are all One. We all seek the sanctity of inner peace, and this peace is available to all who are willing to find it inside their own heart.

Love,Love,Love

Derek

Email from New York District Attorney's Office

From: New York District Attorney's Office
Sent: Friday, July 14, 2017, 11:00 AM
To: Derek O'Neill
Subject: Order of Protection

Dear Mr. O'Neill:

As discussed, Tanya O'Neill is being protected by a security contract and as part of that protection has to complete sensors with a video and audio recording and while by a full and true order of protection.

Thank you again for your cooperation. Please let me know if you have any questions or concerns.

Adam

(<http://www.derekoneill.com/wp-content/uploads/DA-email.png>)

This document is confidential and may be subject to the New York State Freedom of Information Law. It is not to be distributed outside the New York State District Attorney's Office without the written consent of the District Attorney. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this email is strictly prohibited. If you have received this email in error, please notify the sender by return email.

Order of Protection

Dark Attacks: Life with a Stalker | Derek O'Neill

ORI No: NYC0013 Ar-a-term of the County of NY Criminal Part 1 7/2009
 Order No: 136572H at the Courthouse at State of New York
 NYSID No: 136572H
 CJTN No: 136572H

ORDER OF PROTECTION
 Non-Family Offense - C.P.L. §530.13¹
 (Not involving victims of domestic violence)

Present. Hon. HON. LYLE E. FRANK ☐ Youthful Offender (check if applicable)
 Part A Index/Docket No: 2017NY001428
 Indictment No., if any:
 Charges: PL 240.001A

THE PEOPLE OF THE STATE OF NEW YORK
 -against-
TATIANA SCHNEIDER,
 Defendant.

Date of Birth: PL 240.001A (Check one) ☐ Is Part ☒ Defendant Present in Court

NOTICE: YOUR FAILURE TO OBEY THIS ORDER MAY SUBJECT YOU TO MANDATORY ARREST AND CRIMINAL PROSECUTION WHICH MAY RESULT IN YOUR INCARCERATION FOR UP TO SEVEN YEARS FOR CONTEMPT OF COURT. IF THIS IS A TEMPORARY ORDER OF PROTECTION AND YOU FAIL TO APPEAR IN COURT WHEN YOU ARE REQUIRED TO DO SO, THIS ORDER MAY BE EXTENDED IN YOUR ABSENCE AND THEN CONTINUE IN EFFECT UNTIL A NEW DATE SET BY THE COURT.

☐ TEMPORARY ORDER OF PROTECTION - Wherein good cause has been shown for the issuance of a temporary order of protection as a condition of ☐ recognizance ☐ release on bail ☐ show-up or in contemplation of arrest.

☒ ORDER OF PROTECTION - Wherein a defendant has been convicted of [specify crime or violation] PL 240.001A

And the Court having made a determination in accordance with section 530.13 of the Criminal Procedure Law,

IT IS HEREBY ORDERED that the above-named defendant observe the following conditions of behavior (Check applicable paragraphs and subparagraphs):

☒ Stay away from ☒ [name(s) of protected person(s) or witness(es)] Derek O'Neill
 and/or from the ☒ home of Derek O'Neill
☒ school of Derek O'Neill
☒ business of Derek O'Neill
☒ place of employment of Derek O'Neill
☒ other Derek O'Neill

☒ Refrain from communication or any other contact by mail, telephone, e-mail, voice-mail or other electronic or any other means with [specify protected person(s)] Derek O'Neill

☒ Refrain from assault, stalking, harassment, aggravated harassment, menacing, reckless endangerment, disorderly conduct, criminal mischief, sexual abuse, sexual misconduct, forcible touching, intimidation, threats or any criminal offense or interference with the victim or witness of, or designated witness to, the alleged offense and such members of the family or household of such victim(s) or witness(es) as shall be specifically named [specify] Derek O'Neill

☐ Refrain from intentionally violating or failing without justification the following [specify person(s)] [specify type(s)] and, if available, name(s): Derek O'Neill

☐ Surrender any and all handguns, pistols, revolvers, rifles, shotguns and other firearms owned or possessed, including, but not limited to, the following Derek O'Neill and do not obtain any further guns or other firearms. Such surrender shall take place immediately, but in no event later than [specify date/time] at Derek O'Neill

☒ Specify other conditions defendant must observe for the purpose of protection Do not have any contact with the above person(s) through any third parties. NO CONTACT WHATSOEVER.

IT IS FURTHER ORDERED that the above-named Defendant's license to carry, possess, repair, sell or otherwise dispose of a firearm, or firearm, if any, pursuant to Penal Law §401.0, is hereby ☐ suspended or ☐ revoked (Note: Final Order Only), and/or ☐ the Defendant shall remain ineligible to receive a firearm license during the period of this order. (Check all applicable boxes.) **NOTES:** If this paragraph is checked, a copy of this form must be sent to New York State Police, Pistol Permit Section, State Campus Building #22, 1250 Washington Avenue, Albany, New York 12226-2282.

IT IS FURTHER ORDERED that this order of protection shall remain in force until and including [specify date] FEB. 27, 2019

DATED: FEB 28 2017 HON. LYLE E. FRANK
 JUDGE / JUSTICE
 Court (Court Seal)

☐ Defendant advised in Court of issuance and contents of Order Schneider
☒ Order personally served on Defendant in Court Schneider
☐ Order to be served by other means [specify] Schneider
☐ Warrant issued for Defendant Schneider
☐ ADDITIONAL SERVICE INFORMATION [specify] Schneider

The Criminal Procedure Law provides that presentation of a copy of this order of protection to any police officer or peace officer acting pursuant to his or her special duties shall authorize and in some situations may require, such officer to arrest a defendant who is alleged to have violated its terms and to bring him or her before the Court to face penalties authorized by law.

Federal law requires that this order be honored and enforced by state and tribal courts, including courts of a state, the District of Columbia, a commonwealth, territory or possession of the United States, if the person against whom the order is sought is an intimate partner of the protected party and has been or will be afforded reasonable notice and opportunity to be heard in accordance with state law sufficient to protect that person's rights (18 U.S.C. §2265, 2266).

It is a federal crime to:

- cross state lines to violate this order or to stalk, harass or commit domestic violence against an intimate partner or family member;
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition while this Order remains in effect

(Note: there is a limited exception for military or law enforcement officers but only while they are on duty; and

- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition after a conviction of a domestic violence-related crime involving the use or attempted use of physical force or a deadly weapon against an intimate partner or family member, even after this Order has expired. (18 U.S.C. after this Order C. §2226(a), §2261(a)(7), 2261, 2261A, 2262).

¹ Use this form for non-family offense orders of protection, issued pursuant to CPL §530.13, that are not issued to protect victims of domestic violence, as defined by Criminal Procedure Law §530.11(1) or Soc. Serv. Law §445-a and are not entered onto the statewide domestic violence registry. See Exec. L. §221-a(7); CPL §530.11(1), §53.12(1), §50.13.

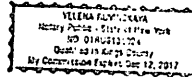
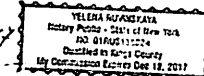
(<http://www.derekoneill.com/wp-content/uploads/Order-of-Protection-Tatiana-Schneider.png>)

Written Apology for Writing False Allegations

To Whom It May Concern:

I, Dr. Tatiana Schneider, am writing this letter to Derek O'Neill. I am truly apologetic for all allegations I have been making against him for the past years. I understand my mistake of writing negative emails and express my emotions. I declare with threat of prosecution, that should I ever in the future reach out to Mr. O'Neill with negative contents, through his social media contacts and all public outlets including but not limited to Facebook, Twitter, Instagram, that the charges that Mr. O'Neill aims to drop with the receipt of this signed letter, will be reinstated with immediate effect. I allow Mr. O'Neil to show this letter to everybody, but I don't allow publishing it in his social media contacts and all public outlets. I sign this letter in the presence of my husband Vladimir Schneider, and notary under my own free will.

Tatiana Schneider 02/27/2017
 Tatiana Schneider / Date, printed name
Tatiana Schneider
Vladimir Schneider 02/27/2017
 Vladimir Schneider / Date, printed name
 VLADIMIR SCHNEIDER



Tags: [abuse \(http://www.derekoneill.com/tag/abuse/\)](http://www.derekoneill.com/tag/abuse/) [cult \(http://www.derekoneill.com/tag/cult/\)](http://www.derekoneill.com/tag/cult/)
[cyber bullying \(http://www.derekoneill.com/tag/cyber-bullying/\)](http://www.derekoneill.com/tag/cyber-bullying/) [cyber crime \(http://www.derekoneill.com/tag/cyber-crime/\)](http://www.derekoneill.com/tag/cyber-crime/)

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<< Previous post (<http://www.derekoneill.com/service-in-action/>)

30 Responses to "Dark Attacks: Life with a Stalker"



Shannon Carson

Good for you Derek for standing up. I am so sorry you and your reputation have had to endure this. I felt very upset by the slanderous emails I would receive from her. I am always standing by you.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment-4962>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4962#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4962#respond)



Bobbi

Dark Attacks: Life with a Stalker | Derek O'Neill

totally agree with you

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4999>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4999#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4999#respond)



liz dooley

It was brought to my attention, that Tanya was sending messages to friends of mine through my page. Luckily enough they knew I was around Derek for many years and knew these allegations were false. Thanking you Derek for all the compassion you have shown, but now time to show it to yourself.. love love love Liz

July 22nd, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5009>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5009#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5009#respond)



Roger

She sent me an unsolicited message of similar accusations of you to my FB messenger. I chose to ignore them and she did not bother me again rather than put any energy in that direction. The thing reaked of mental illness since I have some experience with that in a "friend". And it was really disconcerting that u would have to deal with this. But I have observed that famous successful people in all areas are targets. #compassion.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4963>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4963#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4963#respond)



Bob Reynolds

I have witnessed her and she is someone in need of serious help. Thank you Derek for all you do. Maybe things will change for her in the future. I hope for the best.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4964>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4964#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4964#respond)



Vasili Scandalis

You are always the example of love. Thank you for sharing this powerful story. I stand by you as your student.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4965>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4965#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4965#respond)



Phil

Thanks for sharing and for your integrity and compassion.
May all be well.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4966>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4966#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4966#respond)



Shona King

Dark Attacks: Life with a Stalker | Derek O'Neill

When I contacted your colleague about the messages I received from this lady, they showed nothing but compassion for a woman who is clearly struggling with mental health issues, you are all a wonderful example of forgiveness and compassion even in the face of adversity, we need more examples like you and your colleagues in this world Derek

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4969>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4969#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4969#respond)



Gaynelle Ihms

Derek, I endured physical and emotional threats from a stalker many years ago. I was terrified for my son and for me. Thank you for your honesty and integrity in describing your response to the threats. Blessings and love to you and your family always.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4970>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4970#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4970#respond)



Lynsey

Having witnessed some of her actions over the years, as well as Derek's responses, I also wanted to add a comment here about the enormity of Derek's compassion towards Tanya, and her family, throughout this. I have also received slanderous emails from Tanya in the past, bad-mouthing Derek and his work. I am glad to see that this has come to light, and that Derek is receiving the protection that he deserves, for himself and his family. I wish Tanya well, and hope that she will accept the help she needs.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4971>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4971#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4971#respond)



Colette Savage

I feel blessed to witness over the last ten years the incredible care and compassion you always hold for all that you meet regardless of their state. This is a true example of your immense love, wisdom and patience. You offer us all the most incredibly inspiring example of a life of selfless service helping everyone to the best of your ability with the upmost integrity and the forbearance of your family. Thank you Derek for being you and all the lives you have touched around the world with love and support.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4972>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4972#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4972#respond)



Mary Jo K

I and many others have witnessed the integrity, compassion and kind patience you have shown Tanya over the years. This action serves to open another pathway for her to receive the help she needs, while abiding by the teaching of "the action adhering to the five human values of Love, Truth, Peace, Non-Violence and Right Conduct." May your example of loving kindness expand in myself and the world.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4973>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4973#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4973#respond)



Sheila

I remember sitting next to Tanya during a workshop many years ago. I am so sorry Derek that this happened. I too had been a victim of stalking and there is nothing fun about this experience.... at all. I admire your true love and compassion for Tanya. I pray she gets the help she needs. All of us here Love you so very much.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4996>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4996#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4996#respond)



Jennifer Beardsley

I respect you so much for all you have done to help Tanya, who is a person who obviously suffers greatly from mental illness. You have shown her compassion for many years as you do so many many people. As we know, it is sometimes impossible to help someone who does not want help or who can not see reality that they do in deed, need help.

I admire you for doing what you need to do to take care of and protect yourself and your family.

Sometimes it is a matter of practicing "tough love", which in this instance, the legal action you have taken is tough love and hopefully as you have said, good, will come of it.

You and I had a conversation about tough love, and I appreciate your support in my life, where I needed to practice it as well.

Tanya reached out to me, cloaking her words as tho they were to warn me of potential harm. Her words meant nothing to me and were perceived as the rants of someone very ill.

The truth of who you are shines brilliantly from you heart, rings clearly from the words you speak, and leads through the example of your actions.

Much love and blessings to you and your family.

Jennifer Beardsley

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4974>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4974#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4974#respond)



Melissa

Sometimes being of service means to get that person help, no matter the means. I was in NJ in September last year and remember the ream of paper worth of e-mails. You have done everything in your power to get this individual the help she needs, this is just another form of help. I commend you for trying for so long before involving the law, and now no matter how it comes about, she will get some sort of help, and you and yours are safe. Thank you for all the love you given to so many (my family included) and I wish you a safe, happy and healthy year.

July 19th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4975>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4975#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4975#respond)



Cindy Sonam

Finally, I am Grateful you have taken action and shared the facts Derek. Protecting yourself, precious family, and your life's work is noble; we all learn and grow when courageous loving action is taken, even when it's seemingly unpleasant.

Will simply continue to intend that Tonya interacts with proper health and legal professionals who can make a positive difference in her healing process, while wishing her and her family all the best.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4979>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4979#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4979#respond)



Linda

I'm so glad that you finally spoke out about this. I have watched this injustice for years and have been astounded by your never-ending supply of compassion. But ultimately we all have to stand in truth and do what is right. I really applaud you for your patience and your desire to help Tanya and her family. I wish that it never got to this point, and hope that she does get help. In the meantime it is good to know that not only are you protecting yourself and your family, but you are standing up to this incessant bullying and being a fine example of how to deal with a difficult situation like this.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4980>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4980#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4980#respond)



Louise Devlin

Dear Derek, I am so sorry to hear about what you have experienced. You are one of the most generous, loving, honorable, wise, trustworthy, people I have ever had the privilege to meet. Knowing you for the past fifteen years has been an honor and you have done more for me than words can properly express. I know you treat all with dignity, love and respect and truly only want the best for all you meet. None of these accusations are true. Thank you for sharing and know that you are so loved by so many. With love and the deepest respect for the continuous selfless actions you tirelessly do for so many. Your friend and student, Louise

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4981>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4981#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4981#respond)



Lorelei Pavlovsky

I too received unsolicited emails from her and chose to ignore them. I had no idea how long this had been going on and how it affected your family. I'm glad this is all now being brought to light. Thank you for your service Derek and for upholding the five human values and being a shining example for us all. I stand with you always, love and blessings to you and your family.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4987>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4987#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4987#respond)



Karen Whelan

Thank you Derek for sharing your journey with us. The teaching you offer - to hold such love and light for someone who has projected so much hate,. Yet when surrounded by so much shadow you stay loving yourself and this aspect of her illness. Thank you for your gifts.

Heart ♥

Karen

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4989>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4989#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4989#respond)



Suzanne Poeltler-Crane

Derek, You have been so incredibly patient! The Love you have, The Compassion is unbelievable that you have shown towards Tanya! I am glad that it is done and finally have some PEACE. Thank You for showing us by your actions the Right Thing to do. Thank You for being an impeccable Way Shower.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4991>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4991#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4991#respond)



Michael Remlinger

Thank you for being such an amazing example of LOVE in all that you do; unto others and unto yourself ♥♥♥

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4992>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4992#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4992#respond)



Joanna Herrington

Derek! I'm so sorry you had to go through this and I hope that whatever remains will soon heal completely. XO Also, thank you for sharing this via email. Though I had heard through the grapevine about Tanya's actions and troubles, I am not on social media. Love Love Love ☺

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4997>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4997#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4997#respond)



Trish

Wow. I had absolutely no idea that this was occurring and am shocked to learn about Tanya's behavior toward you, Derek. It has me feeling incredibly sad for Tanya, who, to my view, was as devoted a student and friend of yours as any of us who follow your teachings, attend your workshops, and seek to uphold the five human values under your example. The level of compassion, love, and restraint you wield is astonishing to me. After learning of this, my admiration and respect for you has taken yet another huge leap; yet who would have thought it could rise any higher than it already was? You have changed my life for the better, by showing me how to truly love myself (continual work in progress, of course). I will pray that Tanya finds that same grace for herself. Please know that, as ever, I humbly stand with you.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=4998>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4998#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=4998#respond)



Gunnar

Derek, I can only add to the comments here. I have witnessed some of this person's vile behavior and received her emails with false and vicious allegations. You have shown incredible patience and love, but when she became a threat to you and your family and continued her attempts to ruin your reputation and the great work you do, it was understandably time to get the necessary protection and set the record straight. Let us hope this person gets the help she needs to stop this destructive behavior and become a healthy and contributing member of society again.

Let it also be known that some of us have personally visited the schools, the hospital, clinics and other humanitarian projects you and Linda have established and you are now overseeing with great care and integrity. There is a reason you have received awards such as the Variety International Humanitarian Award and Arts for India Dayawati Modi Global Award, and you have helped numerous people through your workshops and consultations.

Keep up the good work and know that you are respected and supported by so many who have crossed your path.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5000>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5000#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5000#respond)



Sandra Combe

Dear Derek, I also have received her unhealthy false allegations and have unfriended her. Thank you for sharing the details of her actions and your legal outreach with compassion. I hope she gets the help she needs and finds peace of mind.

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5002>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5002#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5002#respond)



Ginger

Oh, Derek! Like Trish, I knew nothing about this. I am deeply shocked and saddened, so very very sad. Such an ordeal, and that the little ones were threatened as well – both terrifying and tragic. My heart goes out to all, including Tanya (not a name I thought I might see). May she seek and receive the help and love that she needs to find her way through the darkness back to the light that she is. May you and your family know that you are in our prayers. I'm grateful that you're safe and that no physical harm came to anyone. I hold you in my heart, always. Thank you, wayshower. You are deeply loved. lovelovelove

Dark Attacks: Life with a Stalker | Derek O'Neill

July 20th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5005>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5005#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5005#respond)



Katherine Irvin

Derek, although I no longer have the means to travel to you, I know you are with me. You guided me through some of the hardest times in my life. asking for nothing in return. I live by your teachings and someday will again be in your light. When you looked into my eyes during a workshop in Ireland, telling me it was OK, I saw an unending level of love. At that moment I was able to forgive myself and knew I was free. As I am today, and always will be, your devoted student. LLL

July 21st, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5006>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5006#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5006#respond)



Leona

Dear Derek, I'm so sorry you've had to endure this harassment. You've been so consistently loving to us all. Your energy is so vibrant, loving, sparkling and kind. May Peace come of this. Peace for all. We all love you!

July 23rd, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5010>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5010#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5010#respond)



Toby

Dear Derek, In publicly sharing what you have endured as a result of Tanya's unconscionable behavior towards you, you are yet again showing the LOVE you are, for in doing so, it gives us all the opportunity to send YOU our love, compassion, & support, & send Tanya love & compassion, too.

You ARE love, & hopefully Tanya will some day regain her senses & realize this also.

July 25th, 2017 (<http://www.derekoneill.com/dark-attacks-life-with-a-stalker/#comment=5017>) [Reply \(http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5017#respond\)](http://www.derekoneill.com/dark-attacks-life-with-a-stalker/?replytocom=5017#respond)

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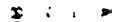
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